

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Case No. 1:17-CV-184 (CCE) (LPA)

BARRY HONIG, an individual,

Plaintiff,

v.

ROBERT LADD, an individual; MGT
CAPITAL INVESTMENTS, INC., a
Delaware corporation; TERI BUHL,
an individual; and DOES 1-20,

Defendants.

**MOTION OF DEFENDANT
TERI BUHL TO DISMISS
PURSUANT TO FED. R. CIV.
P. 12(b)(2), 12(b)(3) AND
12(b)(6)**

Defendant Teri Buhl move to dismiss Plaintiff Barry Honig's Complaint (Docket Entry 1) with prejudice under Federal Rules of Civil Procedure 12(b)(2), 12(b)(3) and 12(b)(6) because this Court lacks personal jurisdiction over Defendant Teri Buhl, Plaintiff filed this case in an improper venue, and the Complaint fails to state a claim upon which relief can be granted. The accompanying brief, as well as the Declarations of Teri Buhl and Erica A. Wolff, Esq., provide additional support for this motion.

WHEREFORE, Defendant Teri Buhl requests that the Court enter an Order as follows:

- (1) Dismissing Plaintiff's Complaint with prejudice;
- (2) Awarding attorneys' fees under, among other things, N.C. Gen. Stat. § 75-16.1(2); and

(3) Awarding Defendant Teri Buhl such other and further relief as may be just and proper.

Respectfully submitted this 5th day of July, 2017.

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*LR 83.1 (d) Special Appearance

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CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send email notification of such filing to the following:

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This the 5th day of July, 2017.

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